

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

---

**DEWEY R. BOZELLA,**

**Plaintiff,**

**v.**

**THE COUNTY OF DUTCHESS**

**Defendant.**

---

)  
)  
)  
)  
)  
) **No. 10 Civ. 4917 (CS)**  
)  
)  
)  
)  
)  
)  
)  
)

**PLAINTIFF DEWEY R. BOZELLA'S NOTICE OF MOTION IN LIMINE TO  
EXCLUDE THE MCKINNEY DOCUMENT AND THE MCKINNEY STATEMENT**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Plaintiff Dewey R. Bozella's Motion in Limine to Exclude the McKinney Document and the McKinney Statement, and the Omnibus Declaration of Ross E. Firsenbaum, dated December 10, 2014, and exhibits thereto, at a time and location to be determined, Plaintiff Dewey R. Bozella will move this Court for an order granting his motion and providing the relief requested therein.

Pursuant to this Court's Order dated September 23, 2014, Dutchess County's opposition to the motion (if any) is due on December 17, 2014.

Dated: New York, New York  
December 10, 2014

Respectfully submitted,

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

By: /s/ Peter J. Macdonald

Peter J. Macdonald  
Ross E. Firsenbaum  
Shauna K. Friedman  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Tel.: (212) 230-8800  
Fax: (212) 230-8888

*Attorneys for Plaintiff Dewey R. Bozella*